
	VITAL TECHNICAL SDN. BHD.	Revision No.	00
	No. 93, Jalan Industri 3/3, Rawang Integrated Industrial Park, 48000 Rawang, Selangor Darul Ehsan.	Effective Date	01/02/2016
		Page	1 of 16

CODE OF CONDUCT

	VITAL TECHNICAL SDN. BHD.	Revision No.	00
	No. 93, Jalan Industri 3/3, Rawang Integrated Industrial Park, 48000 Rawang, Selangor Darul Ehsan.	Effective Date	01/02/2016
		Page	2 of 16

CONTENTS

1. Introduction : Why we have a Code of Conduct
2. Ensuring product safety and quality
3. Working with customers, suppliers and business partners
4. Safeguarding company assets and reputation
5. Workplace conduct
6. Corporate social responsibility and sustainability
7. Reporting non-compliance

	VITAL TECHNICAL SDN. BHD.	Revision No.	00
	No. 93, Jalan Industri 3/3, Rawang Integrated Industrial Park, 48000 Rawang, Selangor Darul Ehsan.	Effective Date	01/02/2016
		Page	3 of 16

INTRODUCTION: WHY WE HAVE CODE OF CONDUCT

Every Vital Technical Sdn Bhd employee is an ambassador of our company. The reputation of our company, as well as our success in achieving our strategic goals, depends on each one of us.

We expect all employees to show responsibility and good citizenship in business and work dealings and to behave in ways that demonstrate our company values - customer focus, entrepreneurship, team spirit, passion and integrity. The Vital Technical Code of Conduct reflects these values and our belief that the best working environment is one built on mutual respect and trust.

This Code sets forth principles and guidelines for behaviour and is complemented by our corporate and local policies and regulations. Our Code applies to all Vital Technical employees. It is the responsibility of each employee to uphold the principles of the Code, and we encourage employees to seek advice or to raise questions or concern at any time with their manager or HR department.



Chee Leong, CHEONG

Managing Director


	VITAL TECHNICAL SDN. BHD.	Revision No.	00
	No. 93, Jalan Industri 3/3, Rawang Integrated Industrial Park, 48000 Rawang, Selangor Darul Ehsan.	Effective Date	01/02/2016
		Page	4 of 16

PRODUCT SAFETY AND QUALITY

We all have a fundamental responsibility to ensure that customers and consumers can trust the safety and quality of our products.

We comply with relevant environmental, safety and health laws and standards, and we follow the regulations at our plants and workplaces.

We take action and immediately correct, or report to a manager, any threat to our product safety or quality.

	VITAL TECHNICAL SDN. BHD.	Revision No.	00
	No. 93, Jalan Industri 3/3, Rawang Integrated Industrial Park, 48000 Rawang, Selangor Darul Ehsan.	Effective Date	01/02/2016
		Page	5 of 16

WORKING WITH CUSTOMERS, SUPPLIERS AND BUSINESS PARTNERS


We demonstrate ethical business behaviour in all our dealings with customers, suppliers and business partners. We strive to ensure that the expectations of our internal and external customers are always met.

Responsible Procurement

We will work with suppliers to ensure that our supply chains share our values. We are committed to the principles of sustainable development and aim to encourage our suppliers to adopt the values of sustainability which we uphold.

Our Responsible Procurement Policy has the following principles:

- 1) Health & Safety – we expect our suppliers to adopt management practices in respect of Health & Safety which provide a high level of safeguarding for their workers.
- 2) Fair Business Practices – the Code of Conduct outlines the ethical standards and fair business practices by which Vital Technical conducts business and we expect our suppliers to adopt similar principles.
- 3) Environmental Protection – we expect suppliers to maintain effective policies, processes and procedures to manage their environmental impact.
- 4) Human Rights – we expect our suppliers to develop and implement policies and procedures to ensure all human rights in their business and to encourage their suppliers to do likewise.

	VITAL TECHNICAL SDN. BHD.	Revision No.	00
	No. 93, Jalan Industri 3/3, Rawang Integrated Industrial Park, 48000 Rawang, Selangor Darul Ehsan.	Effective Date	01/02/2016
		Page	6 of 16

Conflict of interest

We avoid any situations where an employee's private interest may conflict with the interest of Vital Technical Sdn Bhd.

We do not enter into relationship with customers, external suppliers or competitors that might impair judgement in our work on behalf of Vital Technical Sdn Bhd.


While employed at Vital Technical Sdn Bhd an employee may not work for, or provide service to, directly or indirectly to a competing business, customer or supplier of Vital Technical.

Money laundering, gifts, hospitality and entertainment.

Vital Technical is committed to meeting its responsibilities to help prevent money laundering. These responsibilities generally include identifying clients, monitoring client activity and reporting suspicious or unusual activity consistent with applicable laws. We do not solicit, encourage or accept gifts, kickbacks, trips, hospitality, entertainment or other favours from existing or potential customers, suppliers or business partners, unless such favours are of insignificant value and do not influence our sound business judgement.


Fair competition

In all our relationship with customers, external suppliers and competitors we avoid arrangements or actions which restrict fair competition. Vital Technical employees shall not engage in any price fixing, bid rigging, allocation of markets or customers, or any other illegal anti-competitive practices.

	VITAL TECHNICAL SDN. BHD.	Revision No.	00
	No. 93, Jalan Industri 3/3, Rawang Integrated Industrial Park, 48000 Rawang, Selangor Darul Ehsan.	Effective Date	01/02/2016
		Page	7 of 16

Corruption and bribery

We strictly forbid engaging in corrupt practices with any party to advance Vital Technical Sdn Bhd business interests. Corrupt practices include, but are not limited to, the authorization of direct or indirect payments of money, goods or services of value to local government officials, political parties or political candidates, or their friends or relatives, for the purpose of influencing the acts or decisions of local officials. Corrupt practices also include offering or receiving any advantage to or from suppliers, customers, media or other private parties as an inducement to do something which is dishonest, illegal or a breach of trust, in the conduct of business.

	VITAL TECHNICAL SDN. BHD.	Revision No.	00
	No. 93, Jalan Industri 3/3, Rawang Integrated Industrial Park, 48000 Rawang, Selangor Darul Ehsan.	Effective Date	01/02/2016
		Page	8 of 16

PROTECTION OF COMPANY ASSETS AND REPUTATION

Confidentiality


We take great care to safeguard confidential information entrusted to us by Vital Technical Sdn Bhd or its customers and suppliers. Confidential information includes documents, data or knowledge about business figures, new products, formulae, R&D ideas or projects, commercial or marketing strategies, investments, manufacturing processes, and internal policies and procedures. Employees are expected to practice discretion so as to avoid disclosing confidential information outside the office, in particular while traveling, in public areas or while using mobile phones.

Fraud, protection of company assets accounting

We insist on honesty and we respect the company's assets and property. Employees must never engage in fraudulent or any other dishonest conduct involving the property or assets or the financial reporting and accounting of Vital Technical's or any third party. This may not only entail disciplinary actions but also result in criminal charges.


Company property shall be used for Vital Technical Sdn Bhd business purposes only. We respect company property and facilities and treat them with care. This includes keeping factories, laboratories, offices, work areas and hostel clean and tidy. We do not misuse equipment provided to us by the company, including phones, cars or computers.

Computers provided by the company to employees and the data stored on them are the property of Vital Technical Sdn Bhd. Inappropriate use of computers, including the downloading of Internet files that are not related to one's job, is not permitted. No software may be installed on company computers without the permission and participation of the Information Systems department.

	VITAL TECHNICAL SDN. BHD.	Revision No.	00
	No. 93, Jalan Industri 3/3, Rawang Integrated Industrial Park, 48000 Rawang, Selangor Darul Ehsan.	Effective Date	01/02/2016
		Page	9 of 16

Use of social media

Vital Technical Sdn Bhd Group Policy “Social Media Guidelines” must be adhered to at all time when using social media tools for authorized work purpose. Social media tools include social networking sites, video and photo sharing websites, micro-blogging sites, weblogs, collaboration sites, social tagging sites and customer service networks. Failure to do so may result in disciplinary action, up to and including termination of employment with Vital Technical Sdn Bhd. The Social Media Guidelines do not apply to employees’ personal and private use of social media platforms as long as the employee makes no reference to Vital Technical Sdn Bhd related issues such as products, projects, employees, businesses, customers, partners or competitors.


	VITAL TECHNICAL SDN. BHD.	Revision No.	00
	No. 93, Jalan Industri 3/3, Rawang Integrated Industrial Park, 48000 Rawang, Selangor Darul Ehsan.	Effective Date	01/02/2016
		Page	10 of 16

WORKPLACE CONDUCT

We conduct ourselves in a manner that is professional and appropriate. We strictly adhere to the workplace policies and we are committed to keeping the work environment safe, and smoke-, drug- and alcohol-free. We immediately correct, or report to a manager, any workplace accidents and threats to employees' health or safety.

We treat people fairly, with integrity and respect. No employee can be subjected to physical, verbal, sexual or psychological harassment. Workplace harassment is not tolerated.

We provide equal employment and promotion opportunities. We do not discriminate on the basis of gender, religion, race, national or ethnic origin, cultural background, social group, disability or illness, sexual orientation, marital status, age or political opinion. We show respect for different cultures and religions in all our business practices and dealings.

	VITAL TECHNICAL SDN. BHD.	Revision No.	00
	No. 93, Jalan Industri 3/3, Rawang Integrated Industrial Park, 48000 Rawang, Selangor Darul Ehsan.	Effective Date	01/02/2016
		Page	11 of 16

CORPORATE SOCIAL RESPONSIBILITY AND SUSTAINABILITY

We recognize that our businesses have an influence on the livelihoods of many people around the world. We believe we have a responsibility to all our stakeholders – shareholders, customers, consumers, suppliers, employees, and the communities where we operate – that goes beyond making a profit.

We focus our corporate social responsibility (CSR) and sustainability activities on stakeholders along our value chain and on issues related to our business. Through interactions with relevant stakeholders we ensure that Vital Technical Sdn Bhd's activities are properly adapted to meet local conditions and that they generate positive benefits for the company and the respective communities.


Human rights, forced labor and child labor

We observe the principles set forth in the Universal Declaration of Human Rights. We strive to ensure that we are not complicit in human rights abuses. We shall, in all contexts, seek ways to honor the principles of internationally recognized human rights, even when faced with conflicting requirements. We strongly oppose any human beings trafficking. We strongly condemn forced or compulsory labor, child slavery and all practices that exploit children or expose them to harmful or hazardous conditions.

We strictly adhere to local laws regarding minimum age and other terms of employment. The minimum age for employment at Vital Technical Sdn Bhd shall be in accordance with the ILO Convention or the age specified by local legislation if higher.

We do not engage in or support the use of forced or compulsory labor and do not require any lodging deposits or the retention of identity documents upon commencing employment. We do not allow worker's agent withhold any part of any worker's salary, benefits, property or document in order to force such personnel to continue working for the company.

Personnel shall have the right to leave the workplace premises after working hours and free to terminate their employment in accordance with the Contract of Employment.

	VITAL TECHNICAL SDN. BHD.	Revision No.	00
	No. 93, Jalan Industri 3/3, Rawang Integrated Industrial Park, 48000 Rawang, Selangor Darul Ehsan.	Effective Date	01/02/2016
		Page	12 of 16

Health and safety

We shall provide a safe and healthy workplace environment and shall take effective steps to prevent potential accidents and injury to workers health by minimizing the causes of hazards inherent in the workplace environment.

We shall appoint a senior management representative to be responsible for ensuring a safe and healthy workplace environment and implementing the Health and Safety elements of this standard. - Appointment of Safety & Health Personnel.

We shall provide adequate and effective health and safety instruction and training. Such instruction shall be repeated for new and reassigned personnel and in cases where accidents have occurred.


We shall establish systems to detect, avoid, or respond to potential threats to the health and safety of personnel. The Company does maintain written records of all accidents that occur in the workplace.

We do provide appropriate personal protective equipment to personnel and provide first aid and assist the worker in obtaining follow up medical treatment.

We shall undertake to assess all the risk to new and expectant mothers arising out of their work activity and to ensure removing or reduce any risks to their health and safety.

We provides for use by all personnel, access to clean toilet facilities, potable water, and sanitary facilities for food storage. We ensure that any dormitory facilities provided for personnel are clean, safe, and meet the basic needs of the personnel.

All personnel shall have the right to remove themselves from imminent serious danger without seeking permission from the company.

	VITAL TECHNICAL SDN. BHD.	Revision No.	00
	No. 93, Jalan Industri 3/3, Rawang Integrated Industrial Park, 48000 Rawang, Selangor Darul Ehsan.	Effective Date	01/02/2016
		Page	13 of 16

Freedom of association & right to collective bargaining

We shall respect the rights of all personnel to form, join and organize trade unions of their choice and to bargain collectively on their behalf with the company. They are free to join or establish, functioning, or administrate such an organization or collective bargaining.

Where the right to freedom of association and collective bargaining are restricted under law, The Company shall allow workers to freely elect their own representatives.


Any worker's representatives and personnel engaged in organizing workers are not subject to discrimination, harassment, intimidation, or retaliation for reason of their being members of a union or participating in trade union activities, and that such representatives have access to their members in the workplace.

Discrimination and harassment

We do not engage in or support discrimination in hiring, remuneration, access to training, promotion, termination, or retirement based on race, national or social origin, caste, birth, religion, disability, gender, sexual orientation, marital status, union membership, political opinion, age or engage in any kind of verbal or physical harassment based on any of the above or any other reason.

We shall not allow any behavior that is threatening, abusive, exploitative, or sexually coercive, including gesture, language, and physical contact, in the workplace, residences and other facilities provided by the company. We shall not subject personnel to any pregnancy or virginity tests under any circumstances.

Employees who feel that their workplace does not comply with the above principles are encouraged to raise their concerns with the HR Department.

	VITAL TECHNICAL SDN. BHD.	Revision No.	00
	No. 93, Jalan Industri 3/3, Rawang Integrated Industrial Park, 48000 Rawang, Selangor Darul Ehsan.	Effective Date	01/02/2016
		Page	14 of 16

Responsible Marketing

Vital Technical is committed to responsible marketing of our products. We pledge to align our commercial practices with our sustainability goals, our business goals, and our social responsibility values.

We build and maintain trust in our brands and our company by communicating with our suppliers, customers and consumers in a truthful and transparent manner. We will listen and respond positively to reactions of religious, ethnic, cultural or social groups to our advertising/marketing. In selecting media channels and formats for our advertising/marketing, we avoid any media environment that promotes violence, pornography, racism or hatred toward others.

We will ensure a thorough and continuous compliance with our Responsible Marketing Policy.

Conserving environment and reducing energy consumption

We are committed to conserving the environment by minimizing the impact of our business. We work to reduce the overall energy consumption in our factories and facilities, reduce our carbon emissions, and increase our use of energy from renewable sources. We comply with all relevant environmental laws, rules and regulations where we operate. We promptly address, or report to a manager or the Quality Assurance department, any noncompliant practice concerning water, air, electricity or internal or industrial waste.

Developing employees

We strive to provide employees the chance to realize their full potential by offering development and training opportunities. In addition, we support our employees through various services and benefits based on local needs and conditions.

Disciplinary practices

We treat all the personnel with dignity and respect. The use of corporal punishment, mental or physical coercion and verbal abuse is forbidden.

	VITAL TECHNICAL SDN. BHD.	Revision No.	00
	No. 93, Jalan Industri 3/3, Rawang Integrated Industrial Park, 48000 Rawang, Selangor Darul Ehsan.	Effective Date	01/02/2016
		Page	15 of 16

Working hours

We comply with National Law and industry standards on working hours and public holidays.

The normal working hours per week is not more than 48 hours.

We provides at least one day off following every six consecutive days of working. All overtime work is voluntary, and shall not exceed 12 hours per week.

Remuneration


We shall ensure wages paid for regular working hours shall always meet at least legal or industry minimum standard and sufficient to meet the basic needs and to provide some discretionary income.

Illegal, unauthorized or disciplinary deduction from wages shall not be made except permitted by national law and or under the enforcement of collective bargaining agreement.

We ensures that wages and benefits composition are detailed clearly and regularly for workers for each pays period and are rendered in full compliance with all applicable laws and in a manner convenient to workers.

All overtime is reimbursed at a premium rate as defined by national law.

Vital Technical Sdn. Bhd. is committed in fulfilling its obligations to personnel under applicable laws pertaining to labour and social security legislation and regulations – EPF and SOCSO Contributions.

	VITAL TECHNICAL SDN. BHD.	Revision No.	00
	No. 93, Jalan Industri 3/3, Rawang Integrated Industrial Park, 48000 Rawang, Selangor Darul Ehsan.	Effective Date	01/02/2016
		Page	16 of 16

REPORTING NON-COMPLIANCE

The best working environment is one built on mutual respect and trust. We want to continue to foster this kind of environment at Vital Technical Sdn Bhd. To do so, we must strive to be open and straightforward with all our colleagues – managers, team members and peers – in discussions about our values and matters that may impair the reputation and performance of our company. Upholding the principles of the Code of Conduct is the responsibility of each Vital Technical Sdn Bhd employee.

We expect employees to raise their concerns if they are aware of or suspect wrongful acts in violation of the Vital Technical Sdn Bhd Code of Conduct. In such cases, employees should speak directly to the individual involved, or, if they are not comfortable doing so, they should contact their direct manager or HR department.

To share comments or concerns about business practices, employees can send notice to their direct manager or HR department, please report your concerns at e-mail address hr@vitaltechnical.com. Such reports will be kept confidential.

Vital Technical will not tolerate any retaliation against employees who report a suspected violation of the Code of Conduct.